

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA

In re:)	Case No. 24-30202
)	(Chapter 11)
CHAD D. HOVE,)	
)	
Reorganized Debtor.)	
)	
PRECISIONOMICS, LLC)	Case No. 24-30203
)	(Chapter 11)
Reorganized Debtor.)	
)	

MOTION TO WITHDRAW AS COUNSEL

Come now Maurice B. VerStandig and The VerStandig Law Firm, LLC d/b/a The Dakota Bankruptcy Firm (collectively, “DBF”), pursuant to Local Bankruptcy Rule 9010-2(D) and D.N.D. Gen. L.R. 1.3(F), and move to withdraw as counsel for the reorganized debtors herein (the “Debtors”), and in support thereof state as follows:

DBF became counsel to the Debtors upon the substitution of former counsel, in November 2025. Thereafter, in December 2025, DBF reached out to Chad Hove (“Mr. Hove”), via e-mail, on two occasions, to discuss extant issues in these cases. DBF then reached out to Mr. Hove, via e-mail once more, in January 2026, while also sending a paper copy of all three e-mails (as a singular “thread” or “string”) to Mr. Hove’s address of record, via FedEx, in January 2026. DBF also followed up via phone, leaving a lengthy and detailed voicemail at a number known to be Mr. Hove’s.

Unfortunately, Mr. Hove has not responded to any communication from DBF. Counsel is accordingly without any contact with the Debtors and, thusly, without the ability to carry on this representation in conformity with governing ethical rules. *See, e.g.*, N.D.R. Prof. Conduct Rule 1.4 (“A lawyer shall . . . (2) reasonably consult with the client about the means by which the client’s

objectives are to be accomplished; (3) make reasonable efforts to keep the client reasonably informed about the status of a matter. . .”); N.D.R. Prof. Conduct Rule 1.4(b) (“A lawyer shall explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation.”).

DBF very much values the opportunities it is given to serve as counsel to chapter 11 debtors in this Honorable Court and has been keenly excited by the opportunity to serve in such a capacity in these two jointly administered cases. However, absent some communication from the Debtors, it does not appear DBF can ethically carry on as counsel, with the potential peril of such a representation being compounded as there continue to arise various matters that require the action of counsel in these cases.

WHEREFORE, DBF respectfully prays this Honorable Court (i) permit Maurice B. VerStandig and The VerStandig Law Firm, LLC d/b/a The Dakota Bankruptcy Firm to withdraw as counsel in these cases; (ii) strike the appearance of Maurice B. VerStandig and The VerStandig Law Firm, LLC d/b/a The Dakota Bankruptcy Firm herein; and (iii) afford such other and further relief as may be just and proper.

Respectfully submitted,

Dated: January 10, 2026

By: /s/ Maurice B. VerStandig
Maurice B. VerStandig, Esq.
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[Certificate of Service on Following Page]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of January, 2026, a copy of the foregoing was served electronically upon filing via the ECF system and served via US Mail, postage pre-paid, to (i) Chad Hove, 8750 36th St. NE, Jamestown, ND 58401; (ii) Precisionomics, LLC, 8750 36th St. NE, Jamestown, ND 58401.

/s/ Maurice B. VerStandig
Maurice B. VerStandig